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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

Case No. 2:17-cr-00110-APG-DJA

10 Plaintiff,

**Stipulation to Extend Deadline for Reply
Forfeiture Brief (First Request)**

11 v.

12 SYLVIANE D. WHITMORE and

13 LARRY ANTHONY McDANIEL,

14 Defendants.
15

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
17 United States Attorney, through Richard Anthony Lopez and Mina Chang, Assistant United
18 States Attorneys, counsel for the United States of America, Lisa A. Rasmussen, Esq., counsel for
19 defendant Sylviane Della Whitmore, and Daniel Hill, Esq., counsel for defendant Larry
20 Anthony McDaniel, that the Court extend the deadline for the government to file its reply to the
21 response briefs filed by defendants Whitmore and McDaniel (at ECF 313 and 314, respectively)
22 from June 7, 2023, to June 12, 2023.

23 This Stipulation is entered into for the following reasons:
24

1. Pursuant to the parties' stipulation, on April 6, 2023, the Court scheduled supplemental briefing on the issue of forfeiture.

2. On April 14, 2023, the government filed its supplemental brief.

3. Pursuant to the parties' stipulation, the Court extended the time for defendants Whitmore and McDaniel to file their response to May 31, 2023. On May 31, 2023, defendants Whitmore and McDaniel timely filed their responses to the government's supplemental brief.

4. The government requires additional time to adequately respond to the issues raised in those responses.

5. This continuance is not sought for purposes of delay, but to provide the government the necessary time to file a reply.

6. For the reasons stated above, the ends of justice would best be served by a continuance of the deadline. Denial of this request for continuance of the deadline could result in a miscarriage of justice.

7. Defendants are out of custody and do not object to the request for continuance.

8. This is the first request for a continuance of the reply deadline.

DATED this 7th day of June, 2023.

Respectfully submitted,

JASON M. FRIERSON
United States Attorney

/s/ Richard Anthony Lopez
RICHARD ANTHONY LOPEZ
MINA CHANG
Assistant United States Attorneys

/s/ Daniel Hill
DANIEL HILL, ESQ.
Counsel for Defendant McDANIEL

/s/ Lisa A. Rasmussen
LISA A. RASMUSSEN, ESQ.
Counsel for Defendant WHITMORE

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

SYLVIANE D. WHITMORE and

LARRY ANTHONY McDANIEL,

Defendants.

Case No. 2:17-cr-00110-APG-DJA

Order Granting Stipulation to Extend Deadline for Reply Forfeiture Brief (First Request)

SYLVIANE D. WHITMORE and

LARRY ANTHONY McDANIEL

Defendants.

Based on the parties' stipulation to extend the deadline for the government to file its reply brief on forfeiture, and good cause appearing therefore, the Court hereby finds that:

1. Pursuant to the parties' stipulation, on April 6, 2023, the Court scheduled supplemental briefing on the issue of forfeiture.

2. On April 14, 2023, the government filed its supplemental brief.

3. Pursuant to the parties' stipulation, the Court extended the time for defendants
more and McDaniel to file their response to May 31, 2023. On May 31, 2023, defendant
more and McDaniel timely filed their responses to the government's supplemental brief.

4. The government requires additional time to adequately respond to the issues raised in those responses.

5. This continuance is not sought for purposes of delay, but to provide the government the necessary time to file a reply.

6. For the reasons stated above, the ends of justice would best be served by a continuance of the deadline. Denial of this request for continuance of the deadline could result in a miscarriage of justice.

7. Defendants are out of custody and do not object to the request for continuance.

8. This is the first request for a continuance of the reply deadline.

ORDER

IT IS HEREBY ORDERED that the deadline for the government to file a Reply Brief in Support of its Supplement to its Motion for Entry of Forfeiture Order is June 12, 2023;

DATED: June 8, 2023

HON. ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE